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12 *Wells Fargo Bank, N.A.*
13 *(incorrectly named as*
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS A. O'CONNELL;

Plaintiff,

vs.

AMERICAN EXPRESS COMPANY; BANK
OF AMERICA; JP MORGAN CHASE BANK,
NA; FRANKLIN CAPITAL CORPORATION;
SHELL/CBNA; SYNCB/CHEVRON; WELLS
FARGO/DILLARDS; AND EQUIFAX
INFORMATION SERVICES, LLC

Defendants.

Case No. 2:18-cv-00743-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DEFENDANT WELLS
FARGO BANK, N.A.'S TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

It is hereby stipulated by and between Plaintiff Thomas A. O'Connell ("Plaintiff"), through his attorneys, Haines & Krieger, LLC, and Defendant Wells Fargo Bank, N.A., incorrectly named as Wells Fargo/Dillards ("Wells Fargo"), through its attorneys, the law firm of Snell & Wilmer L.L.P., as follows:

Wells Fargo's response to Plaintiff's Complaint is currently due May 22, 2018. In the interest of conserving client and judicial resources, Plaintiffs and Wells Fargo stipulate and agree

1 that Wells Fargo shall have an extension until **June 8, 2018**, in which to file its responsive
2 pleading. This is the parties' first request for an extension of time to respond to the Complaint
3 and is not intended to cause any delay or prejudice to any party, but is intended so that Wells
4 Fargo can conduct a diligent search and obtain records necessary to prepare its response.

5
6 DATED this 8th day of May, 2018.

7	HAINES & KRIEGER, LLC	SNELL & WILMER L.L.P.
8	By: <u>/s/ Rachel B. Saturn</u> David H. Krieger, Esq. (NV Bar No. 9086) Rachel B. Saturn, Esq. (NV Bar No. 8653) 8985 S. Eastern Avenue, Suite 350 Las Vegas, NV 89123 (<i>signed with permission</i>)	By: <u>/s/ Tanya N. Lewis</u> Kelly H. Dove (NV Bar No. 10569) Tanya N. Lewis (NV Bar No. 8855) 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Facsimile: (702) 784-5252
9		<i>Attorneys for Plaintiff Thomas A. O'Connell</i>
10		<i>Attorneys for Defendant</i> Wells Fargo Bank, N.A. (incorrectly named as Wells Fargo/Dillards)
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ORDER

IT IS ORDERED THAT Wells Fargo Bank, N.A.'s time to respond to Plaintiff's Complaint shall be extended to on or before June 8, 2018.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED May 10, 2018.

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Tanya N. Lewis

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: May 8, 2018

/s/ Nissa Riley
An Employee of SNELL & WILMER L.L.P.

4851-8733-8085

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